

EXHIBIT 16

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

| | | |
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| L.W. et al., |) | |
| <i>by and through her parents and next friends,</i> |) | |
| <i>Samantha Williams and Brian Williams,</i> |) | |
| |) | No. 3:23-cv-00376 |
| Plaintiffs, |) | JUDGE RICHARDSON |
| |) | |
| v. |) | |
| |) | |
| JONATHAN SKRMETTI et al., |) | |
| |) | |
| Defendants. |) | |

DECLARATION OF KELLIE C.

I, Kellie C.,¹ declare as follows:

1. I am over the age of 18 years and am not a party to this action. I have actual knowledge of the following facts and, if called upon to testify to them, could and would do so competently. I am submitting this Declaration in support of Defendants' opposition to Plaintiffs' Motion for a Preliminary Injunction.

2. Tennessee recently passed a law prohibiting medical procedures performed on minors "for the purpose of: (A) Enabling a minor to identify with, or live as a purported identity inconsistent with the minor's sex, or (B) Treating purported discomfort or distress from a discordance between the minor's sex and asserted identity," Tenn. Code Ann. § 68-33-101, *et seq.* This Act will provide parents with necessary protections against manipulation and coercion on the part of health care providers, ex-spouses, and confused children to comply with demands for medical and surgical interventions aimed at "affirming" a child's professed discordant gender identity under threats of alienation or loss of a child to suicide.

3. No such parent and child-protective law exists in my home state. Providers have used coercion and manipulation to obtain my consent or blatantly disregarded my decisions for my child's medical and mental health. Tennessee's Act will prevent its parents and children from suffering similar harm. It will restore the rights of all parents, not just those who agree with demands for "gender-affirming" medical interventions, to make medical and mental health care decisions for their children following their natural, healthy development.

4. My daughter, D., became involved in fan fiction at age 11, around the time she began puberty. By age 13, D. had diagnosed herself with gender dysphoria and began identifying

¹ Declarant is submitting this Declaration using a pseudonym to protect the privacy of her children and other family members.

as a 17-year-old male character from Harry Potter. For several years, D. celebrated the birthday of the fictional identity and, at age 17, identified as a 23-year-old male.

5. D. underwent a psychiatric evaluation which found that she is delusional and incapable of caring for herself. She is on the autism spectrum and has OCD and possibly ADHD, but she is not psychotic. The evaluation team admits that D. identifies as a 23-year-old man and proclaims that she has Dissociative Identity (“multiple personality”) Disorder. The psychiatric team does not believe she has DID, but that D. has researched DID and is using it as a maladaptive coping tool for working through the childhood trauma of being sexually assaulted at age 13 or 14.

6. D. is in a residential treatment center. The treatment team has not engaged in therapy with D. to address her underlying issues. Instead, they have embraced her delusion that she is a 23-year-old fictional male character with a transgender identity. The therapists reiterate that they want D. to feel “safe,” so they will not address any underlying issues unless D. brings it up on her own.

7. D. has asked for puberty blockers and testosterone. Despite her myriad comorbidities and unaddressed sexual trauma, the treatment team said that D. is ready for “gender-affirming” medical interventions. The therapists and psychologists have told me that if I do not consent, I “will have a dead daughter instead of a ‘live son.’” The providers constantly tell me I must “get on board” with what D wants.

8. The therapists and D.’s father told her that my refusal to consent was the only thing standing in the way of her getting those treatments. As a result, my daughter has alienated me, and I have been banned from knowing her medical status.

9. Today, D. is 19. As far as I know, D. never received puberty blockers or cross-sex hormones. Five months ago, D's younger brother, age 17, told me that D. no longer identifies as the 17-year-old fictional character from Harry Potter. Now, D bounces back and forth to multiple characters, calling herself "AND-I." It's expected that everyone embraces D.'s ever-changing pronouns and various personas, including the "transgender" aspect of any given character.

10. Tennessee's Act protects its vulnerable children by making these medical interventions unavailable. The Act will also prevent the harm inflicted on parents who fight to defend their mentally disturbed children from irresponsible healthcare providers. It is a necessary regulation that should be upheld for the protection of children and their families.

I declare under penalty of perjury that the foregoing is true and corrected.

Executed on May 18, 2023.

/s/ Kellie C.
Kellie C. (pseudonym)